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EXHIBIT B

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17 18 19	Interim Lead Counsel for Individual and Representati Plaintiffs and the Proposed Class [Additional counsel included below]	ive
20	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
22 23 24 25 26	Richard Kadrey, et al., Individual and Representative Plaintiffs, v. Meta Platforms, Inc.,	Case No. 3:23-cv-03417-VC PLAINTIFFS' SEVENTH SET OF REQUESTS FOR PRODUCTION TO DEFENDANT META PLATFORMS, INC.
27	Defendant.	

PLAINTIFFS' SEVENTH SET OF REQUESTS FOR PRODUCTION TO DEFENDANT META

Case No. 3:23-cv-03417-VC

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DEFINITIONS

In accordance with Federal Rules of Civil Procedure 26 and 34, and orders issued by the Court in

this matter, Plaintiffs, by and through their undersigned attorneys, request that Meta produce for inspection

and copying, by March 19, 2025, the documents and things described below, in accordance with the

following definitions and instructions. Meta must produce documents and other things described below

electronically or at the offices of Boies Schiller Flexner, LLP, 44 Montgomery St., 41st Fl., San Francisco,

As used herein, the following words, terms, and phrases—whether singular or plural, or in an alternate verb tense—shall have the meanings ascribed below. Defined terms may not be capitalized or made uppercase. The given definitions apply regardless of whether a term in question is capitalized or made uppercase. No waiver of a definition is implied by the use of a defined term in a non-capitalized or lowercase form:

- 1. "Any," "or," and "and": "Any" should be understood to include and encompass "all"; "or" should be understood to include and encompass "and"; and "and" should be understood to include and encompass "or."
- 2. "Data" means content, files, information, metadata, software, or any other digital material, including Documents.
- 3. "Document" is used in its broadest sense allowed by Federal Rule of Civil Procedure 34(a), and includes:
 - All application logs, command-line history logs (including the .bash_history file in the user home directories of servers used for downloading data), download logs, data processing records, usage reports, server logs, network traffic reflecting torrent downloads or uploads (including during the leeching and seeding phases), and descriptor files; and
 - All data acquired via torrent clients copied to any data storage solution such as local servers, virtual servers, cloud-based storage, including Amazon Web Services S3 synchronization logs, data integrity checks, and access control records.

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- 4. "Including" and "includes" are used to provide examples of certain types of information and should not be construed as limiting a request or definition in any way. The terms "including" and "includes" shall be construed as if followed by the phrase "but not limited to."
- 5. "Meta" and "Your" refers to Defendant Meta Platforms, Inc., including its employees, agents, attorneys, accountants, representatives, predecessors or successors-in-interest, any corporation or partnership under its direction or supervision, or any other person or entity acting on its behalf or under its control.
- 6. "Online Database(s)" means the type of databases described in paragraphs 43 and 44 of Plaintiffs' Third Amended Consolidated Complaint, Dkt. No. 407, at p.8—online databases with copyrighted material or books including but not limited to Books3, b3g, Z-Library (aka B-ok), Library Genesis (aka LibGen), Bibliotik, Anna's Archive, Internet Archive, DuXiu, and The Pile. The term encompasses all versions, updates, augmentations, or modifications of such databases, and the distribution, provision, or sharing of copyrighted material or books by other users, or peers, via the torrent protocol or network.
- 7. "Torrent Client(s)" means a network or application designed for sharing computer data that was used by Meta to obtain Data from any Online Database, including but not limited to BitTorrent and LibTorrent.

INSTRUCTIONS

- 1. The relevant date range for the Request for Production herein is January 1, 2022 to the present.
- 2. If You claim You are unable to produce a Document, you must state whether that inability is because the Document never existed; has been destroyed, lost, misplaced or stolen; or has never been or is no longer in your possession, custody or control. Such a statement must further set forth the name and address of any person or entity that you know or believe to have possession, custody or control of that item or category of item. If any Document responsive to a request has been destroyed, produce all documents describing or referencing: (1) the contents of the lost or destroyed document; (2) the locations in which any copy of the lost or destroyed Document had been maintained; (3) the date of any such loss or destruction to the extent known; (4) the name of each person who ordered, authorized and carried out the destruction of

any lost or destroyed Document; (5) all document retention and destruction policies in effect at the time any

requested Document was destroyed; and (6) all efforts made to locate any responsive Document that was

particularity each document or thing to which the objection is made and (b) set forth clearly the extent of,

and specific ground for, the objection; and You should respond to the Request to the extent it is not

product, You must provide a Privilege Log containing: (1) the name of the Document; (2) the name and

address of the person(s) who prepared it; (3) the person(s) to whom it was directed or circulated; (4) the date

on which the Document was prepared or transmitted; (5) the name and address of the person(s) now in

possession of the Document; (6) the description of the subject matter of the Document; (7) the filename or

pathname of the Document; and (8) the specific nature of the privilege claimed, including the reasons and

each and every fact supporting the withholding, and legal basis sufficient to determine whether the claim of

REQUEST FOR PRODUCTION OF DOCUMENTS

to obtain Data from Online Databases, including the filename, size, file creation time, and file last modified

date of the Data; configuration files or equivalent settings registries, bandwidth logs, work files, and support

tickets; and Amazon Web Services invoices relating to Your data usage, storage, or transfer.

Documents sufficient to show the installation, usage, configuration, and operation of Torrent Clients

If You object to any item or category of item, Your response shall (a) identify with

If You object that a Document is covered by the attorney-client or other privilege, or is work-

lost or destroyed.

3.

objectionable.

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privilege is valid.

REQUEST FOR PRODUCTION NO. 137

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1 Dated: March 5, 2025 By: /s/ Maxwell V. Pritt Maxwell V. Pritt 2 3 LIEFF CABRASER HEIMANN & BOIES SCHILLER FLEXNER LLP BERNSTEIN, LLP David Boies (pro hac vice) 4 Elizabeth J. Cabraser (SBN 083151) 333 Main Street Daniel M. Hutchinson (SBN 239458) Armonk, NY 10504 5 Reilly T. Stoler (SBN 310761) (914) 749-8200 275 Battery Street, 29th Floor dboies@bsfllp.com 6 San Francisco, CA 94111-3339 7 (415) 956-1000 Maxwell V. Pritt (SBN 253155) ecabraser@lchb.com Joshua M. Stein (SBN 298856) 8 dhutchinson@lchb.com 44 Montgomery Street, 41st Floor San Francisco, CA 94104 rstoler@lchb.com 9 (415) 293-6800 Rachel Geman (pro hac vice) mpritt@bsfllp.com 10 250 Hudson Street, 8th Floor jstein@bsfllp.com 11 New York, NY 10013 (212) 355-9500 Jesse Panuccio (pro hac vice) 12 Jay Schuffenhauer (pro hac vice) rgeman@lchb.com 1401 New York Ave, NW 13 Washington, DC 20005 Kenneth S. Byrd (pro hac vice) Betsy A. Sugar (pro hac vice) (202) 237-2727 14 222 2nd Avenue South, Suite 1640 jpanuccio@bsfllp.com 15 ischuffenhauer@bsfllp.com Nashville, TN 37201 (615) 313-9000 16 kbyrd@lchb.com Joshua I. Schiller (SBN 330653) bsugar@lchb.com David L. Simons (pro hac vice) 17 55 Hudson Yards, 20th Floor 18 JOSEPH SAVERI LAW FIRM, LLP New York, NY 10001 Joseph R. Saveri (SBN 130064) (914) 749-8200 19 Cadio Zirpoli (SBN 179108) jischiller@bsfllp.com Christopher K.L. Young (SBN 318371) dsimons@bsfllp.com 20 Margaux Poueymirou (SBN 356000) Holden Benon (SBN 325847) Interim Lead Counsel for Individual and 21 Aaron Cera (SBN 351163) Representative Plaintiffs and the Proposed 22 601 California Street, Suite 1505 Class San Francisco, California 94108 23 (415) 500-6800 jsaveri@saverilawfirm.com 24 czirpoli@saverilawfirm.com cyoung@saverilawfirm.com 25 mpoueymirou@saverilawfirm.com hbenon@saverilawfirm.com 26 acera@saverilawfirm.com 27 28

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